

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

ROGER REEVES,)	
)	
Plaintiff,)	Civil Action No.
)	1:07CV616-MHT
)	
v.)	
)	
DSI SECURITY SERVICES <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**OBJECTIONS OF DEFENDANTS DSI SECURITY SERVICES, INC. AND
AMERICAN BUILDINGS COMPANY TO SCHEDULING ORDER**

COMES NOW DSI Security Services, Inc. (“DSI”) and American Buildings Company (“American Buildings”), defendants in the above-captioned matter and, pursuant to the Court’s Scheduling Order entered September 24, 2007, file the following objections to the deadlines set forth in the Scheduling Order:

1. Plaintiff filed his Complaint on July 2, 2007. Defendant DSI filed a pre-Answer motion for summary judgment on August 3, 2007 and defendant American Buildings filed a pre-Answer motion to dismiss that same date. Those dispositive motions remain pending before the Court.

2. On September 24, 2007, the Court entered a Scheduling Order, setting a dispositive motion deadline of December 10, 2007 and a discovery deadline of January 11, 2008.

3. Plaintiff resides in Eufala, Alabama and counsel for DSI and American Buildings are located in Birmingham, Alabama and Atlanta, Georgia, respectively, several hours from plaintiff's residence. The third defendant, EEOC, is represented by counsel in Washington, D.C. Given the number of defendants in this case, the geographical separation of the parties and plaintiff's apparent unwillingness or inability to travel (as evidenced by his request for a telephone scheduling conference rather than an in-chambers conference in Montgomery), coordination of depositions and other discovery likely will require more time than otherwise anticipated.

4. In addition, previously-existing deadlines in cases being litigated by counsel for the undersigned defendants, as well as the natural delays caused by year-end holidays and vacations, will make it difficult if not impossible to complete discovery by the current deadline.

5. Accordingly, defendants DSI and American Buildings respectfully request that the current dispositive motion and discovery deadlines be extended by ninety (90) days. With the requested extension, the new deadlines would be as follows: dispositive motions – March 10, 2008; discovery – April 10, 2008.

6. Counsel for defendant EEOC has been consulted and takes no position regarding these objections and extension requests.

Respectfully submitted,

/s/ Daniel M. Shea

(signed with permission)

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Certificate of Service

I hereby certify that on October 3, 2007 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system and that a copy was delivered via First Class U.S. Mail, postage prepaid on the following:

Roger Reeves
B-12 Chattahoochee Court
Eufala, Alabama 36027

I further certify that a copy of the foregoing will be served via the CM/ECF System on the following counsel of record:

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/s/ David T. Wiley
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